

## REMARKS

In an Office Action mailed on April 6, 2010, claims 1-3, 11, 12, 16, 18, 22, 97 and 99-103 were rejected under 35 U.S.C. § 103(a) as being unpatentable over Springer in view of Roberts.

Claim 1 has been amended to more positively recite certain aspects of the body. More specifically, as amended, the body of claim 1 includes a first opening to receive an end of the first tubing section to connect the first tubing section to the body at the first opening; and the body further includes a second opening to receive an end of the second tubing section to connect the second tubing section to the body at the second opening.

Due to the amendment to claim 1, Springer's outer tubing string 22 (the alleged body of claim) may not be considered the body of claim 1, in that the outer tubing string 22, as Springer fails to disclose that the outer tubing string 22 includes a first opening to receive an end of the inner tubing string 21 (the alleged first and second tubing sections of claim 1) for purposes of connecting the inner tubing string 21 to the outer tubing string 22 at the first opening. Moreover, Springer also fails to disclose a second opening of the outer tubing string 22 to receive an end of the inner tubing string 21 for purposes of connecting the inner tubing string 21 to the outer tubing string 22 at the second opening.

Thus, in view of amended independent claim 1, the hypothetical combination of Springer and Roberts fails to disclose or render obvious all of the limitations of this claim, such as, for example, the claimed body. Therefore, Applicant respectfully requests allowance of amended independent claim 1.

For similar reasons, Applicant requests allowance of amended independent claim 97, which now recites a first body, which includes a first opening to receive an end of the first tubing section to connect the first tubing section to the body at the first opening and a second opening to receive an end of the second tubing section to connect the second tubing section to the body at the second opening.

Regarding the method of independent claim 101, as amended, this claim now recites providing a first opening in the body to receive an end of the first tubing section to connect the first tubing section to the body at the first opening, and providing a second opening in the body to receive an end of the second tubing section to connect the second tubing section to the body at

the second opening. As such, amended independent claim 101 overcomes the § 103 rejection for at least the same reasons that are set forth above.

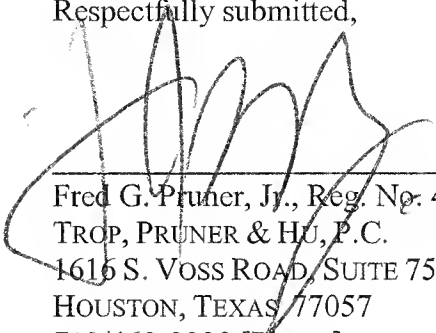
Dependent claims 2, 3, 11, 12, 16, 18, 22, 99, 100, 102, 103 and newly-added claims 106-108 are patentable for at least the same reasons as the claims from which they depend.

### CONCLUSION

In view of the foregoing, Applicant respectfully requests a favorable action in the form of a Notice of Allowance. The Commissioner is authorized to charge any additional fees or credit any overpayment to Deposit Account No. 20-1504 (SHL.0238US).

Respectfully submitted,

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